

August 28, 2008

Phil Isenberg, Chair  
Delta Vision Blue Ribbon Task Force  
c/o California Bay-Delta Authority  
650 Capitol Mall, 5th floor  
Sacramento, CA 95814

Dear Chairman Isenberg,

Thank you for the opportunity to review and comment on the third staff draft of the *Delta Vision Strategic Plan*. The Blue Ribbon Task Force, Dr. Kirlin, and the Delta Vision staff have done an extraordinary job of taking a rough and cumbersome draft of the strategic plan and producing a clear, well-organized, and highly readable third draft. The *Introduction* and *Delta Vision Context* clearly capture the gravity of the resource management issues in the Delta and provide a straightforward summary of the circumstances leading to the *Four Key Themes* and the need for the recommended strategies. In addition, Table 2 is a very useful overview of the indicators and associated performance measures. This table highlights the magnitude and importance of the monitoring effort necessary for success in implementing the strategic plan, and this high-level approach provides value in an uncomplicated manner.

In general, The Nature Conservancy supports the comprehensive, integrated set of strategies and performance measures presented in this draft. In carrying out our mission to conserve biological diversity, one of our objectives is to advance ecologically sustainable water management—ways to meet human needs for water while keeping ecosystems healthy. From our perspective, the current draft strategic plan comprises strategies that set the course toward ecologically sustainable water management in the Delta. We offer the following specific comments for your consideration.

Strategy 3 would be improved by providing a more detailed discussion of the storage and conveyance benefits associated with setback levees that increase in-channel storage, flood bypasses, and floodplain restoration.

Strategy 14 shows 2020 as the year the Delta Conservancy and related entities should acquire easements, purchase options, or fee title in areas adjacent to the highest priority ecosystem restoration areas. Why wait until 2020?

Strategy 15 should contain a mechanism whereby the Governor is not able to fire the entire council when dissatisfied with the general direction of its work or decision making. Following are additional comments on Strategy 15:

- With regard to the California Delta Ecosystem and Water Council, we recommend that the Delta Vision Strategic Plan specify the required experience and expertise of each council member.
- Given the time it will take to get a Delta Conservancy organized and fully functional (budget development, staffing, etc.), a more efficient and expedient course of action would be to charge the Coastal Conservancy with several of the functions described on pages 75 and 76 of the draft strategic plan and give it the authorities needed to carry out those functions. A Delta Conservancy could later "spin off" from the Coastal Conservancy upon completion of the recommended assessment of the Delta's needs and after experience has given managers a better sense of the magnitudes of funding, staff, and other required resources.
- With regard to the Delta Science and Engineering Program, we recommend that the strategic plan clarify whether the Program and the Program Board subsume or replace the CALFED Science Program and Independent Science Board.
- With regard to integrated implementation of the co-equal goals of ecosystem revitalization and reliable water supplies, the strategic plan should clarify the intent and meaning of the language at the top of page 81: "...simultaneous achievement of the co-equal goals...." This language is in contrast to the Delta Vision statement regarding the co-equal goals: "This principle of equality does not mean that these two values will somehow be precisely balanced in every policy or management decision" (page 8, *Delta Vision: Our Vision for the California Delta*). Similarly, the document should clarify what is intended by linking expenditures and results in ecosystem revitalization and improving water supply reliability to a shared calendar; this could be interpreted to mean ecosystem revitalization actions could be delayed by lack of progress in actions improving water supply reliability or vice versa.

We hope these comments are useful to you and look forward to continued work with you on this momentous plan.

Sincerely,



Susan Tatayon  
Assistant Director, CA Water Program  
The Nature Conservancy